

THE LAW OFFICES OF ALEXANDER LONSTEIN, P.C.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: DMCA SECTION 512(h)
SUBPOENA TO DISCORD, INC.

CASE NO.

EKATERIA LISINA
REQUEST TO CLERK FOR
ISSUANCE OF SUBPOENA
PURSUANT TO 17 U.S.C. §
512(h), TO IDENTIFY
ALLEGED INFRINGERS

Petitioner Ekaterina Lisina ("Lisina"), through its undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena on Discord Inc. ("Discord") to identify an alleged infringer or infringers, pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (the "DMCA Subpoena"). The proposed DMCA Subpoena is attached hereto as Exhibit A. The DMCA Subpoena is directed to Discord, the service provider of the following

- **"Discord Server", "tall woman appreciation club" Discord Server ID**

1190715403895312415 and accounts:

- **"Charles Brown" User ID 826219499559583754,**
- **"Lrid34" User ID 719424294697959505,**
- **"mistersnickerdoodle" User ID 1014842107099369482,** to which the infringing parties, identified as

- **Discord Server ID 1190715403895312415** and accounts
- **“Charles Brown” User ID 826219499559583754,**
- **“Lrid34” User ID 719424294697959505,**
- **“mistersnickerdoodle” User ID 1014842107099369482,** posted content known as
“Pictures and Videos of Ekaterina Lisina” via Discord.com invite
- **<https://discord.com/invite/DyPdaN6t>, Message ID number 1200676544985694208**
which infringes copyright rights held by Ekaterina Lisina (the "Infringing Content").
(See Affidavit of Ekaterina Lisina.,)

Ekaterina Lisina has satisfied the requirements for issuance of a subpoena pursuant to 17 U.S.C. § 512(h), namely:

- (1) Ekaterina Lisina has submitted a copy of the notification required by 17 U.S.C. § 512(c)(3)(A) as Exhibit 1 to the Ekaterina Lisina Affidavit, submitted concurrently herewith;
- (2) Ekaterina Lisina has submitted the proposed DMCA Subpoena concurrently herewith; and
- (3) Ekaterina Lisina has submitted a sworn declaration confirming that the purpose for which the DMCA Subpoena is sought is to obtain the identity of an alleged infringer or infringers, and that such information will only be used for the purpose of protecting Ekaterina Lisina's rights under Title 17 U.S.C. § 512(h)(2) submits and attaches:

- A copy of the notification described in 17 U.S.C. § 512(c)(3)(A)
(See Lisina Aff., Ex. I);
- A proposed DMCA Subpoena directed to the service provider(Discord) (Ex. A hereto); and
- A sworn affidavit that the purpose for which the DMCA Subpoena is sought is proper under the DMCA. (See Affidavit of Ekaterina Lisina.)
Because Ekaterina Lisina has complied with the statutory requirements,Ekaterina Lisina respectfully requests that the Clerk expeditiously issue and sign the proposed DMCA Subpoena pursuant to 17 U.S.C. § 512(h)(4) and return it to undersigned counsel for service on the subpoena recipient.

Dated: June, 14 2024

Respectfully submitted.

THE LAW OFFICES OF ALEXANDER LONSTEIN, P.C.

/s/Alexander Lonstein